

REMARKS

Claims 1-20 stand in this application. Claims 1, 10, 13 and 18 have been amended. No new matter has been added. Favorable reconsideration and allowance of the standing claims are respectfully requested.

At page 2, paragraph 2, of the Office Action claims 1-20 stand rejected under 35 U.S.C. § 102(e) as being anticipated by United States Patent Number (USPN) 6,058,421 (Fijolek). Applicant respectfully traverses the rejection, and requests reconsideration and withdrawal of the anticipation rejection.

Applicant respectfully submits that to anticipate a claim under 35 U.S.C. § 102(e), the cited reference must teach every element of the claim. *See* MPEP § 2131, for example. Applicant submits that the Fijolek reference fails to teach each and every element recited in claims 1-9 and 13-17 and thus they define over the Fijolek reference. For example, with respect to claims 1 and 13 as amended, the Fijolek reference fails to teach, among other things, the following language:

receiving a first request for a network address from a client
at an agent; [and]
procuring said network address by said agent for said client
from a network address provider.

According to the Office Action, Fijolek discloses “receiving a first request for a network address from a client at an agent (col. 3, lines 39-67, col. 4 lines 1-32).” Office Action, Page 2. Applicant respectfully disagrees. The Fijolek reference fails to disclose an “agent” as recited in claims 1 and 13. Rather, the Fijolek reference at the given cite, in

relevant part, arguably states that a first network device receives a selection input having a first connection address for a first network, and uses the first connection address to request a network host interface address on the first network. In other words, Fijolek attempts to describe the first network device obtaining an address for itself. In contrast, the claimed subject matter recites "receiving a first request for a network address from a client at an agent." Fijolek fails to describe an "agent" in any context, let alone as recited in claims 1 and 13.

Although Applicant submits that claims 1 and 13 represent patentable subject matter in their original form, Applicant has amended claims 1 and 13 to further clarify that the "agent" procures a network address on behalf of the client. Consequently, the Fijolek reference fails to disclose all the elements or features of the claimed subject matter. Accordingly, Applicant respectfully requests removal of the anticipation rejection with respect to claims 1 and 13. Furthermore, Applicant respectfully requests withdrawal of the anticipation rejection with respect to claims 2-9 and 14-17, which depend from claims 1 and 13, respectively, and therefore contain additional features that further distinguish these claims from the Fijolek reference.

Claims 10-12 and 18-20 recite features similar to those recited in claims. Therefore, for reasons analogous to those presented with respect to claims 1-9 and 13-17, Applicant respectfully submits that claims 10-12 and 18-20, are not anticipated and are patentable over the Fijolek reference. Accordingly, Applicant respectfully requests removal of the anticipation rejection with respect to these claims.

For at least the above reasons, Applicant submits that claims 1-20 recite novel features not shown by the cited reference. Further, Applicant submits that the above-

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recited novel features provide new and unexpected results not recognized by the cited reference. Accordingly, Applicant submits that the claims are not anticipated nor rendered obvious in view of the cited reference.

Applicant does not otherwise concede, however, the correctness of the Office Action's rejection with respect to any of the features of the independent claims or dependent claims discussed above. Accordingly, Applicant hereby reserves the right to make additional arguments as may be necessary to further distinguish the independent or dependent claims from the cited references, taken alone or in combination, based on additional features contained in the independent or dependent claims that were not discussed above. A detailed discussion of these differences is believed to be unnecessary at this time in view of the basic differences in the independent claims pointed out above.

It is believed that claims 1-20 are in allowable form. Accordingly, a timely Notice of Allowance to this effect is earnestly solicited.

The Examiner is invited to contact the undersigned at 724-933-3387 to discuss any matter concerning this application.

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The Office is hereby authorized to charge any additional fees or credit any overpayments under 37 C.F.R. § 1.16 or § 1.17 to Deposit Account No. 02-2666.


Respectfully submitted,

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Under 37 CFR 1.34(a)

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10-22-04
Date

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